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October 22, 2019

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Via ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *United States v. Kozel*, Case No. 19-cr-460-KMW

Dear Judge Wood:

I have filed an unconditional permanent notice of appearance as counsel of record for Defendant Todd Kozel in the above-referenced matter.

The Court previously entered an order requiring Mr. Kozel to give notice of motions he intends to file. While we are not certain of all of the motions that will be filed, we do intend to file a motion addressing the vagueness of the pending indictment (through a motion to dismiss or alternative request for bill of particulars).

We are still in the process of receiving discovery, which is in the ballpark of 80,000 documents.

We are requesting a motion deadline approximately ninety (90) days out, *i.e.*, until January 23, 2020, for the filing of any pretrial motions. This would allow us to review the discovery and address issues with the AUSAs to attempt to resolve any issues by negotiation.

We have discussed this matter with the assigned prosecutor, Louis “Tony” Pellegrino, who is in agreement with this proposed schedule.

Very truly yours,

s/Kendall B. Coffey

cc: Louis A. Pellegrino
Olga I. Zverovich